

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

BREE MCCLESKEY,	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	CIVIL ACTION NO. 1:20-cv-00166-ML
	§	
TOLTECA ENTERPRISES, INC. D/B/A THE	§	
PHOENIX RECOVERY GROUP, & SINGER	§	
MANAGEMENT, LLC, & GEORGETOWN	§	
PLACE, LTD. a/k/a GEORGETOWN PLACE	§	
APARTMENTS, & TRAVELERS	§	
CASUALTY AND SURETY COMPANY OF	§	
AMERICA,	§	
<i>Defendants.</i>	§	

**DEFENDANT GEORGETOWN PLACE, LTD.’S SECOND UNOPPOSED MOTION TO
EXTEND THE DEADLINE TO ANSWER OR OTHERWISE RESPOND TO
PLAINTIFF’S FIRST AMENDED COMPLAINT**

Pursuant to FED. R. CIV. P. 6(b), Defendant Georgetown Place, Ltd. (“Georgetown Place”) files this *Second Unopposed Motion to Extend the Deadline to Answer or Otherwise Respond to Plaintiff’s Complaint* (“Motion”), as follow:

1. Defendants’ current deadline to respond to the *First Amended Complaint* (Doc. No. 26) filed by Plaintiff Bree McCleskey (“Plaintiff”) is February 24, 2021. This is Georgetown Place’s second request for an extension of time to respond to the *First Amended Complaint*.

2. The winter storm in Austin, Texas, during the week of February 14, 2021, caused Counsel for Georgetown Place to be unable to sufficiently prepare a response by the current deadline of February 24, 2021, due to power outages and attendant duties related to the lack of running water for continuous days last week. In addition, the parties intend to attempt to resolve this matter this week prior to the expenditure of fees relating to the preparation of a responsive

pleading. Based on the foregoing, Georgetown Place requests a one-week extension of time in order to prepare a responsive pleading to the *First Amended Complaint*.

3. This motion is not sought for purposes of delay, but so that justice may be done.

4. Plaintiff is unopposed to this request.

WHEREFORE, Georgetown Place respectfully requests that the Court grant this Motion and extend Georgetown Place's deadline to answer or otherwise respond to Plaintiff's *First Amended Complaint* to March 3, 2021.

Respectfully submitted,

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By: 

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**ATTORNEY FOR DEFENDANT
GEORGETOWN PLACE, LTD.**

CERTIFICATE OF CONFERENCE

I certify that I conferred with counsel for Plaintiff on February 22, 2021 via email. Plaintiff is unopposed to the relief requested in this Motion.



Counsel for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served upon all counsel of record *via ECF transmission*, pursuant to the Federal Rules of Civil Procedure on this 23rd day of February, 2021.

A handwritten signature in blue ink, appearing to read "Daniel Dyer", is written above a horizontal line.

Counsel for Defendant